



EPA Region 5 Records Ctr.



225250

November 10, 2000

TERRANCE GILEO FAYE
Of Counsel
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Mr. T. J. Martin, Esq. (C-14J)
U.S. Environmental Protection Agency ("EPA")
77 W. Jackson Blvd.
Chicago, Illinois 60604

Via Overnight Delivery

**Re: Sauget Area 2 Site ("Site")
Administrative Order by Consent ("AOC")**

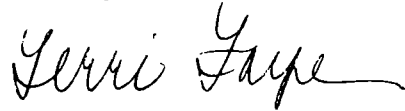
Dear Mr. Martin:

Thank you for speaking with the Sauget Area 2 Sites Group ("Group") on November 7, 2000 concerning the AOC for the above-referenced Site. As suggested during that call, I am sending with this letter a portion of an AOC from Newton County, MO, EPA Region VII, concerning Reimbursement of Costs and the accounting documentation EPA has agreed to provide at that site for both response and oversight costs. I know that you have been provided with other samples on this issue and hope that these samples will help you review this matter. Unfortunately, I was unable to find a sample AOC with "predecessor language." If you do not wish to include "predecessor language" in the AOC, I am asking that all predecessors and successors of American Zinc Company be included in the Sauget Area 2 Site AOC whenever and/or wherever American Zinc Company is referenced. Those companies in chronological order are: American Zinc, Lead and Smelting Company; American Zinc Company; Gold Fields American Corporation; and Blue Tee Corp.

With regard to Section III, Paragraph 3 of the AOC, I am requesting documentation of involvement of American Zinc Company and/or its predecessor or successor companies ("American Zinc") at sites Q and/or R. As I explained on the call, I believe that American Zinc was not involved at these sites, but rather the company you are seeking is Amax Zinc Company ("Amax"). In 1971, Amax took over operations of the American Zinc facility in Sauget, and subsequently purchased the facility in 1972. I am asking that American Zinc be omitted from Section III, Paragraph 3 at Site Q and/or R, unless you can provide this documentation to me.

Thank you again for considering these issues and the comments submitted by the Group as a whole. If you have any questions concerning any of the issues raised by this letter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Terri Faye". The signature is written in black ink and is positioned below the word "Sincerely,".

Terrance Gileo Faye, Esq.

cc: Group members